



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY
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APPLICATION GRANTED
SO ORDERED

Vern Bro
VERNON S. BRODERICK
U.S.D.J. 6/5/23

June 2, 2023

VIA ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Estate of Benjamin DeVincenzi v. Police Officer Paule Rivera*,
19 Civ. 6012 (VSB)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney representing defendant Police Officer Paule Rivera in the above-referenced matter. With the consent of plaintiff's counsel, Arthur Schwartz, defendant writes to respectfully request that the Court enlarge the parties' time to file a proposed joint pretrial order by four (4) weeks, from July 3 until July 31, 2023.

Yesterday, on June 1, 2023, the Court issued an Opinion and Order denying defendant's motion for summary judgment. (ECF No. 97). Pursuant to Rule 6.A. of Your Honor's Individual Rules & Practices in Civil Cases, a proposed joint pretrial order is due 30 days after yesterday's Opinion and Order. By operation of Fed. R. Civ. P. 6(a)(1)(C), the proposed joint pretrial order is due July 3, 2023.

The undersigned counsel will be out of the office for his wedding in mid-June and out of the country from July 3–16, 2023, and has so informed plaintiff's counsel. Further, plaintiff's counsel has intervening briefing deadlines in other matters throughout the next month. Hence, both parties would benefit from a four-week enlargement of the time within which to file the proposed joint pretrial order. Defendant respectfully requests that the Court extend this deadline accordingly, until July 31, 2023.

Defendant thanks the Court for its consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeffrey Frank", written over a horizontal line.

Jeffrey F. Frank

Assistant Corporation Counsel

Special Federal Litigation Division

cc: All Counsel (via ECF)